

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA }
 }
V. }
 }
MICHAEL AMBERS }
 }

CRIMINAL NO. 04-10390-WGY

**DEFENDANT'S MOTION TO SUPPRESS EVIDENCE BASED ON
WARRANTLESS SEARCH AND REQUEST FOR EVIDENTIARY HEARING**

The Defendant, Michael Ambers, hereby moves to suppress all evidence obtained on or about July 26, 2004, as a result of a motor vehicle stop that occurred by the New Bedford Police Department in which he was a passenger. The Defendant also moves to suppress custodial statements attributed to him after he was arrested, as those statements are fruits of the illegal stop and ensuing arrest. As grounds for this motion, Mr. Ambers states that the stop and subsequent search violated his rights under the Fourth Amendment to the United States Constitution. The Defendant further refers the court to the supporting memorandum of law.

The Defendant requests an evidentiary hearing on this motion.

Respectfully Submitted,
Michael Ambers,
By his attorney,

/s/ Frank D. Camera
Frank D. Camera
B.B.O. #635930
56 N. Main Street
Fall River, MA 02720
508-677-2878

CERTIFICATE OF SERVICE

I, Frank D. Camera, certify that I forwarded a copy of this motion to AUSA Christopher Bator on August 29, 2005 via electronic filing.

/s/ Frank D. Camera
Frank D. Camera